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CHAPTER 7 TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	
	§	Case No. 22-31641-mvl-7
GOODMAN NETWORKS, INC.,	§	
	§	(Chapter 7)
Debtor.	§	
	§	
	§	
SCOTT M. SEIDEL, TRUSTEE; and	§	
GNET ATC, LLC,	§	
	§	ADVERSARY PROCEEDING
Plaintiffs,	§	NO: 23-03072-mvl
	§	
v.	§	
	§	
18920 NW 11th, LLC; JAMES GOODMAN;	§	
STEVEN ZAKHARYAYEV; EVELINA	§	
PINKHASOVA; PEOPLE NQ INC.;	§	
JJC & PEOPLE LLC; GDMN FAMILY	§	
INVESTMENTS 2, LLC,	§	
	§	
Defendants.	§	
	§	

**TRUSTEE’S MOTION FOR PARTIAL SUMMARY JUDGMENT
AGAINST 18920 NW 11TH, LLC**

COMES NOW Scott M. Seidel (the “Trustee”), the plaintiff in this Adversary Proceeding, and files this his *Trustee’s Motion for Partial Summary Judgment Against 18920 NW 11th, LLC* (the “Motion”), respectfully stating as follows:

Pursuant to Federal Rule of Civil Procedure 56, as incorporated in this Adversary Proceeding by Federal Rule of Bankruptcy Procedure 7056, the Trustee hereby seeks summary judgment against defendant 18920 NW 11th, LLC on Counts 1, 2, and 4 of his *Trustee's Amended Complaint*.

Pursuant to Local Rules, the Trustee sets forth his arguments in support of summary judgment in his *Brief In Support of the Trustee's Motion for Partial Summary Judgment Against 18920 NW 11th, LLC*, filed concurrently herewith and incorporated herein.

Pursuant to Local Rules, the Trustee sets forth his evidence in support of summary judgment in his *Appendix In Support of the Trustee's Motion for Partial Summary Judgment Against 18920 NW 11th, LLC*, filed concurrently herewith and incorporated herein.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that the Court enter judgment against 18920 NW 11th, LLC for: (i) \$13,474,075; (ii) reasonable and necessary attorney's fees incurred herein; (iii) prejudgment and postjudgment interest as appropriate; (iv) avoiding, and ordering the return to the estate of, the License and the Trademarks as defied in the Trustee's brief; and (v) such other and further relief to which the Trustee is justly entitled.

RESPECTFULLY SUBMITTED this 23d day of January, 2025.

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Davor Rukavina

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CHAPTER 7 TRUSTEE**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on the 23d day of January, 2025, true and correct copies of this document were served via the Court's CM/ECF system on the following counsel for the defendants:

Michael A Cancienne on behalf of Defendants 18920 NW 11th, LLC, Evelina Pinkhasova, and Steven Zakharyayev
mcancienne@jlcfirm.com

Randall A. Pulman on behalf of Defendants GDMN Family Investments 2, LLC, JJC & People LLC, People NQ Inc., and James Goodman
rpulman@pulmanlaw.com, jgonzales@pulmanlaw.com; mvilla@pulmanlaw.com.

/s/ Davor Rukavina _____
Davor Rukavina, Esq.